

ESTTA Tracking number: **ESTTA744808**

Filing date: **05/06/2016**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91224122
Party	Defendant Turner Foods, LLC
Correspondence Address	MATTHEW H SWYERS THE TRADEMARK COMPANY PLLC 344 MAPLE AVE W STE 151 VIENNA, VA 22180-5612 UNITED STATES admin@thetrademarkcompany.com, mswyers@thetrademarkcompany.com
Submission	Answer
Filer's Name	Matthew H. Swyers, Esq.
Filer's e-mail	mswyers@thetrademarkcompany.com
Signature	/Matthew H. Swyers/
Date	05/06/2016
Attachments	ANSWER.pdf(87691 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
The Trademark Trial and Appeal Board

In the matter of Appl. Serial No. 86/503,214;
For the mark THE PRESERVATION SOCIETY,

Societe des Caves et des Producteurs Reunis de-
Roquefort,

Opposer,

vs.

Turner Foods, LLC,

Applicant.

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Opposition No. 91224122

ANSWER AND GROUNDS OF DEFENSE

COMES NOW the Applicant, Turner Foods, LLC (hereinafter “Applicant”), by and through counsel, The Trademark Company, PLLC, and files its Answer and Grounds of Defense to the Notice of Opposition and in response to Opposer’s allegations states as follows:

ANSWER

Applicant is without knowledge of the allegations set forth in the Introductory Paragraph of the Notice of Opposition and therefore denies the same. In response to the specifically enumerated paragraphs, the Applicant states as follows:

1. Applicant denies the allegations set forth in paragraph 1 of the Notice of Opposition as phrased and demands strict proof thereof.
2. Applicant denies the allegations set forth in paragraph 2 of the Notice of Opposition as phrased and demands strict proof thereof.
3. Applicant denies the allegations set forth in paragraph 3 of the Notice of Opposition and demands strict proof thereof.
4. Applicant denies the allegations set forth in paragraph 4 of the Notice of Opposition and demands strict proof thereof.

5. Applicant denies the allegations set forth in paragraph 5 of the Notice of Opposition and demands strict proof thereof.

6. Applicant denies the allegations set forth in paragraph 6 of the Notice of Opposition as phrased and demands strict proof thereof.

7. Applicant denies the allegations set forth in paragraph 7 of the Notice of Opposition and demands strict proof thereof.

8. Applicant denies the allegations set forth in paragraph 8 of the Notice of Opposition and demands strict proof thereof.

Applicant further denies all allegations not specifically, actually or constructively, admitted in the foregoing paragraphs of this Answer and Grounds of Defense.

WHEREFORE, Applicant prays that the Notice of Opposition be dismissed.

Respectfully submitted this 6th day of May, 2016.

THE TRADEMARK COMPANY, PLLC

/Matthew H. Swyers/

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Counsel for Applicant

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I caused a copy of the foregoing this 6th day of May, 2016 to be
served, via first class mail, postage prepaid, upon:

DENNIS S PRAHL
LADAS & PARRY LLP
1040 AVENUE OF THE AMERICAS
NEW YORK, NY 10018-3738

/Matthew H. Swyers/
Matthew H. Swyers